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April 28, 2022

Honorable Colleen McMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

BY ECF

Re: United States v. James Cahill  
20 Cr. 521 (CM)

Dear Judge McMahon:

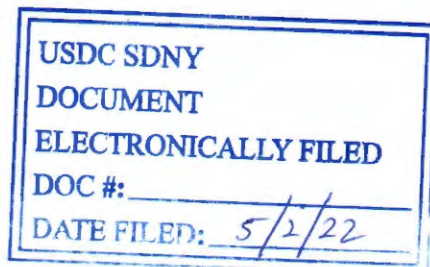
As the Court is aware, defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with location monitoring and travel restrictions. By this letter, Cahill respectfully requests permission to attend his grandson's confirmation in Queens, New York on May 5, 2022 from 2:30 pm to 10:00 pm (travel included). He additionally requests permission to attend a Mother's Day luncheon with his wife, children and grandchildren in Rockland County on May 8, 2022, from 2:30-7:30 (travel included). The exact relevant locations have been provided to Pretrial Services ("Pretrial") and the government.

Pretrial, by United States Pretrial Services Officer Andrew Abbott, consents to the travel for the confirmation but does not consent to the Mother's Day travel pursuant to Pretrial's policy not to consent to travel for social reasons as to any defendant on home detention. The government, by Assistant United States Attorney Jason Swergold, defers to Pretrial's positions on these requests.

Thank you for Your Honor's consideration of these requests.

Very truly yours,  
Sanford Talkin  
Sanford Talkin

cc: AUSA Jason Swergold (by ECF)  
USPTO Andrew Abbott (by email)



MEMO ENDORSED

5/2/2020  
Informative yes  
Mother's Day No  
✓